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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUL 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Local Exchange Carriers' Rates,)
Terms, and Conditions for)
Expanded Interconnection for)
Special Access)

CC Docket No. 93-162

MOTION FOR EXTENSION OF TIME TO FILE DIRECT CASE

Bell Atlantic¹ respectfully requests an extension of time until September 10, 1993 to file its direct case. The additional four weeks is needed for Bell Atlantic to develop and provide the Commission with the vast amounts of detailed material it has required Bell Atlantic to submit.² Many of the Bell Atlantic personnel who must gather and prepare the material for this proceeding are also working on other Commission tariff proceedings which are on a parallel track.

On June 9, 1993, the Common Carrier Bureau suspended the special access expanded interconnection tariffs of Bell Atlantic and other Tier 1 Local Exchange Carriers ("LECs") and initiated an investigation.³ It was not until more than six

¹ The Bell Atlantic telephone companies ("Bell Atlantic") are The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac telephone companies, The Diamond State Telephone Company and New Jersey Bell Telephone Company.

² *Order Designating Issues for Investigation*, DA 93-951 (rel. July 23, 1993) ("Order").

³ *Ameritech Operating Companies, Transmittal Nos. 697, et al.* 8 FCC Rcd 4589 (1993).

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weeks later that the Bureau issued the Order designating the issues to be investigated. The Order then gave Bell Atlantic only a scant three weeks, *less than half the time the Bureau took to designate issues*, to submit its direct case. This schedule will prevent Bell Atlantic, and the other Tier 1 LECs, from presenting their direct cases effectively. In addition, the Bureau arbitrarily gave opponents more time to rebut the direct cases than it gave the LECs to prepare them.

The Order includes a detailed Appendix C containing 34 pages of minute detail that Bell Atlantic is required to submit as its Tariff Review Plan ("TRP").⁴ The format of the TRP is non-standard, so that Bell Atlantic cannot easily extract the required information from its databases used to produce other Commission data submissions.

In addition, the Commission requires Bell Atlantic to submit, among other material:

- Narrative documentation for each of the TRP data entries, plus "relevant worksheets and source listings."⁵
- Detailed information regarding overhead loadings both for collocation and for comparable services.⁶
- Quantification of the difference between book and market value of land and buildings for central offices in which collocation is offered.⁷

⁴ See Order at App. C.

⁵ *Id.* at ¶ 22(b).

⁶ *Id.* at ¶ 22(c).

⁷ *Id.* at ¶ 22(f).

- Detailed information regarding costs of DC power,⁸ use of repeaters,⁹ and security charges.¹⁰
- Detailed discussion justifying each type of insurance specified in the tariff.¹¹

This is just a sample of the information the Commission has required Bell Atlantic to submit in an unreasonably short period. Development of the material will require the coordination of a variety of work groups throughout Bell Atlantic. This would be time-consuming in the best of circumstances, but coming

tion of 1984 and 1985 data on other common carrier special access charges in CC Docket No. 85-166, currently due August 12.¹³

Bell Atlantic is sensitive to the need for the Commission to complete its investigation promptly. However, it is incumbent upon the Commission to afford the parties sufficient time to prepare a probative direct case.

A four week extension, until September 10, will allow Bell Atlantic to respond effectively to the Bureau's unprecedented requests and present a direct case that provides the record needed to make a fair assessment of this important tariff.

Respectfully submitted,

**The Bell Atlantic Telephone
Companies**

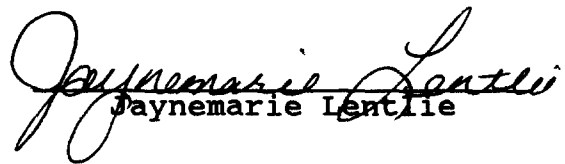
By Their Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Motion for Extension of Time to File Direct Case" was served this 28th day of July, 1993, by delivery thereof by first class mail, postage prepaid, to the parties on the attached list.


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